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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE  
 ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*In re Google Play Consumer Antitrust  
 Litigation*, Case No. 3:20-cv-05761-JD

*State of Utah et al. v. Google LLC et al.*,  
 Case No. 3:21-cv-05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF SUJAL J. SHAH IN  
 SUPPORT OF ADMINISTRATIVE  
 MOTION TO CONSIDER WHETHER  
 ANOTHER PARTY'S MATERIALS  
 SHOULD BE SEALED RE NOTICE OF  
 FILING OF DECLARATION OF DR.  
 GREGORY K. LEONARD**

Judge: Hon. James Donato

1           1.       I, Sujal J. Shah, am an attorney at Morgan, Lewis & Bockius LLP, counsel of  
 2 record for Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google  
 3 Payment Corp., Google Asia Pacific Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in  
 4 this multi-district litigation (MDL). I am a member in good standing of the State Bar of  
 5 California and admitted to practice in the state and federal courts of California. I respectfully  
 6 submit this declaration in support of Google’s Administrative Motion to Consider Whether to  
 7 Seal Another Party’s Materials Relating to Google’s Notice of Filing of Declaration of Dr.  
 8 Gregory K. Leonard In Response to Court’s Order Re Dr. Singer’s Proposed Expert Testimony  
 9 and the related materials filed in support of that motion (“Notice of Filing”).

10           2.       I submit this declaration pursuant to Civil Local Rule 79-5. The contents  
 11 of this declaration are based on my personal knowledge. If called upon as a witness in  
 12 this action, I could and would testify competently thereto.

13           3.       The accompanying exhibit to Google’ Notice of Filing contains portions that are  
 14 sourced from materials that (on behalf of non-parties) have been designated as “NON-PARTY  
 15 HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY”, pursuant to the operative  
 16 Protective Orders entered by the Court, Case No. 3:21-md-02981-JD, ECF Nos. 247, 248, and  
 17 249. The following table shows the portions of Exhibits that contain information designated as  
 18 “NON-PARTY HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL EYES ONLY”.

Document	Portion Containing Designated Information	Designating Party
Exhibit 1	Page 13, Paragraph 19 (between “shares of” and “respectively as of”)	Rosetta Stone, Duolingo, and PictureThis
Exhibit 1	Page 13, Paragraph 19 (between “Duolingo (” and “versus”)	PictureThis
Exhibit 1	Page 13, Paragraph 19 (between “versus” and “) simply”)	Duolingo
Exhibit 1	Page 13, Paragraph 19 (between “Rosetta Stone (versus” and “as predicted by”)	PictureThis

Document	Portion Containing Designated Information	Designating Party
Exhibit 1	Page 13, Paragraph 19, Table (all figures under “Category Share” and “Logit Model’s Assumption Regarding Percentages of Switching from ‘Rosetta Stone’ to ‘Duolingo’ and ‘PictureThis – Plaintiff Identifier’” columns)	Rosetta Stone, Duolingo, and PictureThis

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14th day of August 2023 in San Francisco, California.

s/ Sujal J. Shah  
Sujal J. Shah